

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

[illegible]

NewRez LLC d/b/a Shellpoint Mortgage Servicing, its assignees and/or successors, (“Respondent”) in the above-entitled Bankruptcy proceeding, hereby submits the following Response to Motion To Value Collateral [Dkt 84] (“Motion”) proposed by Censo LLC (“Debtor”) regarding the real property located at 5900 Negril Avenue, Las Vegas, NV 89130.

STATEMENT OF FACTS

1. Respondent holds a Promissory Note which is secured by a First Deed of Trust on the subject property commonly known as 5900 Negril Avenue, Las Vegas, NV 89130 (“Subject Property”).
2. The total amount of Respondent’s secured claim as of July 2020 was *approximately* \$517,569.54.
3. Debtor filed their Motion on 8/20/2020 proposing to value the Subject Property at \$363,000.00 and avoid Respondent’s lien, deeming it an unsecured claim of \$154,569.54, using an appraisal dated 12/31/2019 - See Dkt.84.
4. Respondent now opposes Debtor's Motion and requires additional time of at least 45 days to obtain its own value of the subject property.

WHEREFORE, Respondent prays as follows:

1. That Debtor's Motion To Value Collateral [Dkt 84] be denied; alternatively, continued for an additional 45 days; and
2. For such other relief as this Court deems proper.

Dated: 9/10/2020

Respectfully submitted,
McCarthy & Holthus, LLP

By: /s/ Michael Chen
Michael Chen, Esq.
Attorney for
NewRez LLC d/b/a Shellpoint
Mortgage Servicing, its assignees
and/or successors